

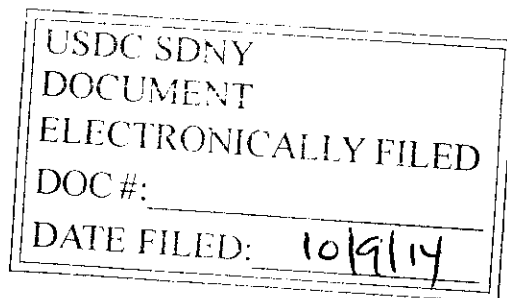
ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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:  
UNITED STATES OF AMERICA :  
:  
- v. - :  
:  
RALIK HANSEN, :  
a/k/a "Ralik Taylor," :  
a/k/a "Rahlik," :  
a/k/a "Rah," :  
a/k/a "Ratchet," :  
KENDAL THOMPSON, :  
SEAN ROBINSON, :  
a/k/a, "Sean Vicks," :  
a/k/a, "Luca," :  
a/k/a, "Luca Brasi," :  
COURTNEY HARDIN, :  
a/k/a, "Mazie," :  
a/k/a, "Mozie," :  
RYAN CAMPBELL, :  
a/k/a "Shaky," and :  
JAMAL DEHOYOS, :  
:  
Defendants. :  
- - - - - x

SEALED INDICTMENT

S4 14 Cr. 130 (RPP)



COUNT ONE

(Hobbs Act Robbery Conspiracy)

The Grand Jury charges:

1. From at least on or about July 1, 2013, up to and including on or about January 30, 2014, in the Southern District of New York and elsewhere, RALIK HANSEN, a/k/a "Ralik Taylor," a/k/a "Rahlik," a/k/a "Rah," a/k/a "Ratchet," KENDAL THOMPSON, SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," COURTNEY HARDIN, a/k/a "Mazie," a/k/a "Mozie," RYAN CAMPBELL, a/k/a "Shaky," and JAMAL DEHOYOS, the defendants, and

others known and unknown, knowingly did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, HANSEN, THOMPSON, ROBINSON, HARDIN, CAMPBELL, DEHOYOS and others agreed to commit, and committed, robberies of jewelry and watch stores, in the Southern District of New York and elsewhere, which sell goods that had been manufactured and shipped in interstate commerce.

Overt Acts

2. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about July 1, 2013, SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," the defendant, and others participated in the robbery of a jewelry store located in Atlantic City, New Jersey and stole merchandise.

b. On or about September 23, 2013, KENDAL THOMPSON, RALIK HANSEN, a/k/a "Ralik Taylor," a/k/a "Rahlik," a/k/a "Rah," a/k/a "Ratchet," and SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a

"Luca," a/k/a "Luca Brasi," the defendants, and others participated in the gunpoint robbery of a jewelry store located in Brooklyn, New York, in which a store employee was shot with a firearm, and stole merchandise.

c. On or about October 28, 2013, SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," and COURTNEY HARDIN, a/k/a "Mazie," a/k/a "Mozie," the defendants, and others participated in the robbery of a jewelry store located on Nassau Street in New York, New York and stole merchandise.

d. On or about November 3, 2013, SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," and COURTNEY HARDIN, a/k/a "Mazie," a/k/a "Mozie," the defendants, and others participated in the robbery of a jewelry store located on Madison Avenue in New York, New York and stole merchandise.

e. On or about November 6, 2013, RALIK HANSEN, a/k/a "Ralik Taylor," a/k/a "Rahlik," a/k/a "Rah," a/k/a "Ratchet," SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," COURTNEY HARDIN, a/k/a "Mazie," a/k/a "Mozie," and RYAN CAMPBELL, a/k/a "Shaky," the defendants, and others participated in the robbery of a jewelry store located in New Canaan, Connecticut and stole merchandise.

f. On or about January 9, 2014, RALIK HANSEN, a/k/a "Ralik Taylor," a/k/a "Rahlik," a/k/a "Rah," a/k/a "Ratchet," SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," COURTNEY HARDIN, a/k/a "Mazie," a/k/a "Mozie," and JAMAL DEHOYOS, the defendants, and others participated in the robbery of a jewelry store located in Cranford, New Jersey and stole merchandise.

g. On or about January 30, 2014, RALIK HANSEN, a/k/a "Ralik Taylor," a/k/a "Rahlik," a/k/a "Rah," a/k/a "Ratchet," and COURTNEY HARDIN, a/k/a "Mazie," a/k/a "Mozie," the defendants, and others participated in the robbery of a jewelry store located in New York, New York and stole merchandise.

(Title 18, United States Code, Section 1951.)

**COUNT TWO**

(Use of a Firearm in Furtherance of Robberies)

The Grand Jury further charges:

3. From at least on or about July 1, 2013, up to and including on or about January 30, 2014, in the Southern District of New York and elsewhere, KENDAL THOMPSON, RALIK HANSEN, a/k/a "Ralik Taylor," a/k/a "Rahlik," a/k/a "Rah," a/k/a "Ratchet," and SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," the defendants, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the robbery conspiracy charged in Count One of this Indictment, knowingly did use and carry firearms,

and in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying, and possession of firearms, one or more of which was discharged during one of the robberies.

(Title 18, United States Code, Sections  
924(c)(1)(A)(iii) and 2.)

**COUNT THREE**  
(Atlantic City, NJ Robbery)

The Grand Jury further charges:

4. On or about July 1, 2013, in the Southern District of New York and elsewhere, SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," the defendant, and others known and unknown, knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, ROBINSON and others committed a robbery of a jewelry store located in Atlantic City, New Jersey, which was engaged in the sale of watches and other items in interstate commerce.

(Title 18, United States Code, Sections 1951 & 2.)

**COUNT FOUR**

(New York, NY - Nassau Street Robbery)

The Grand Jury further charges:

5. On or about October 28, 2013, in the Southern District of New York and elsewhere, SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," and COURTNEY HARDIN, a/k/a "Mazie," a/k/a "Mozie," the defendants, and others known and unknown, knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, ROBINSON, HARDIN and others committed a robbery of a jewelry store located on Nassau Street in New York, New York, which was engaged in the sale of watches and other items in interstate commerce.

(Title 18, United States Code, Sections 1951 & 2.)

**COUNT FIVE**

(New York, NY - Madison Avenue Robbery)

The Grand Jury further charges:

6. On or about November 3, 2013, in the Southern District of New York and elsewhere, SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," and COURTNEY HARDIN, a/k/a "Mazie," a/k/a "Mozie," the defendants, and others known and unknown, knowingly did commit robbery, as that term is defined

in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, ROBINSON, HARDIN and others committed a robbery of a jewelry store located on Madison Avenue in New York, New York, which was engaged in the sale of watches and other items in interstate commerce.

(Title 18, United States Code, Sections 1951 & 2.)

**COUNT SIX**

(New Canaan, CT Robbery)

The Grand Jury further charges:

7. On or about November 6, 2013, in the Southern District of New York and elsewhere, RALIK HANSEN, a/k/a "Ralik Taylor," a/k/a "Rahlik," a/k/a "Rah," a/k/a "Ratchet," SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," COURTNEY HARDIN, a/k/a "Mazie," a/k/a "Mozie," and RYAN CAMPBELL, a/k/a "Shaky," the defendants, and others known and unknown, knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, HANSEN, ROBINSON, HARDIN, CAMPBELL and others committed a robbery of a jewelry store located in New Canaan, Connecticut which was

engaged in the sale of watches and other items in interstate commerce.

(Title 18, United States Code, Sections 1951 & 2.)

**COUNT SEVEN**  
(Cranford, NJ Robbery)

The Grand Jury further charges:

8. On or about January 9, 2014, in the Southern District of New York and elsewhere, RALIK HANSEN, a/k/a "Ralik Taylor," a/k/a "Rahlik," a/k/a "Rah," a/k/a "Ratchet," SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," COURTNEY HARDIN, a/k/a "Mazie," a/k/a "Mozie," and JAMAL DEHOYOS, the defendants, and others known and unknown, knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, HANSEN, ROBINSON, DEHOYOS and others committed a robbery of a jewelry store located in Cranford, New Jersey which was engaged in the sale of watches and other items in interstate commerce.

(Title 18, United States Code, Sections 1951 and 2.)



**COUNT EIGHT**

(New York, NY - Fifth Avenue Robbery)

The Grand Jury further charges:

9. On or about January 30, 2014, in the Southern District of New York, RALIK HANSEN, a/k/a "Ralik Taylor," a/k/a "Rahlik," a/k/a "Rah," a/k/a "Ratchet," and COURTNEY HARDIN, a/k/a "Mazie," a/k/a "Mozie," the defendants, and others known and unknown, knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, HANSEN, HARDIN and others committed a robbery of a jewelry store located on Fifth Avenue in New York, New York, which was engaged in the sale of watches and other items in interstate commerce.

(Title 18, United States Code, Sections 1951 and 2.)

**FORFEITURE ALLEGATION AS TO COUNT ONE**

10. As the result of committing the offense charged in Count One of this Indictment, in violation of Title 18, United States Code, Section 1951, RALIK HANSEN, a/k/a "Ralik Taylor," a/k/a "Rahlik," a/k/a "Rah," a/k/a "Ratchet," KENDAL THOMPSON, SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," COURTNEY HARDIN, a/k/a "Mazie," a/k/a "Mozie," RYAN CAMPBELL, a/k/a "Shaky," and JAMAL DEHOYOS, the defendants,

shall forfeit to the United States, pursuant to 18 U.S.C.

§ 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offenses alleged in Count One through Eight of this Indictment, including but not limited to a sum in United States currency representing the amount of proceeds obtained as a result of the offenses.

**FORFEITURE ALLEGATION AS TO COUNT THREE**

11. As the result of committing the offense charged in Count Three of this Indictment, SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," the defendant, shall forfeit to the United States, pursuant to 18 U.S.C.

§ 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of such offense.

**FORFEITURE ALLEGATION AS TO COUNT FOUR**

12. As the result of committing the offense charged in Count Four of this Indictment, SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," and COURTNEY HARDIN, a/k/a "Mazie," a/k/a "Mozie," the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of such offense.

**FORFEITURE ALLEGATION AS TO COUNT FIVE**

13. As the result of committing the offense charged in Count Four of this Indictment, SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," and COURTNEY HARDIN, a/k/a "Mazie," a/k/a "Mozie," the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of such offense.

**FORFEITURE ALLEGATION AS TO COUNT SIX**

14. As the result of committing the offense charged in Count Six of this Indictment, RALIK HANSEN, a/k/a "Ralik Taylor," a/k/a "Rahlik," a/k/a "Rah," a/k/a "Ratchet," SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," COURTNEY HARDIN, a/k/a "Mazie," a/k/a "Mozie," and RYAN CAMPBELL, a/k/a "Shaky," the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of such offense.

**FORFEITURE ALLEGATION AS TO COUNT SEVEN**

15. As the result of committing the offense charged in Count Seven of this Indictment, RALIK HANSEN, a/k/a "Ralik Taylor," a/k/a "Rahlik," a/k/a "Rah," a/k/a "Ratchet," SEAN

ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," COURTNEY HARDIN, a/k/a "Mazie," a/k/a "Mozie," and JAMAL DEHOYOS, the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of such offense.

**FORFEITURE ALLEGATION AS TO COUNT EIGHT**

16. As the result of committing the offense charged in Count Eight of this Indictment, RALIK HANSEN, a/k/a "Ralik Taylor," a/k/a "Rahlik," a/k/a "Rah," a/k/a "Ratchet," and COURTNEY HARDIN, a/k/a "Mazie," a/k/a "Mozie," the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of such offense.

**Substitute Assets Provision**

17. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 981, 21 U.S.C. § 853(p), and 28 U.S.C. § 2461, to seek forfeiture of any other property of the defendants up to the value of the forfeitable property.

(Title 18, United States Code, Sections 981 and 1951;  
Title 28, United States Code, Section 2461; and  
Title 21, United States Code, Sections 841(a)(1) and 853.)

  
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FOREPERSON  
\_\_\_\_\_  
PREET BHARARA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

RALIK HANSEN, et al.,

Defendants.

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SEALED SUPERSEDING INDICTMENT

S4 14 Cr. 130 (RPP)

(18 U.S.C. §§ 1951,  
924(c)(1)(A)(iii) and 2.)

PREET BHARARA

Foreperson.

United States Attorney.

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10/9/14 - Filed Sealed Superseding Indictment  
cc A/W issued  
Judy Hansen  
WMJ